

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

Stanley L Watson, Sr., and	)	Case No.: 17-45822-399
Victoria Watson,	)	
	)	Chapter 13
Debtors,	)	
	)	
U.S Bank National Association, as Trustee	)	
for SASCO Mortgage Loan Truste 2005-	)	
WF3, its successors and/or assigns	)	
	)	
Respondent,	)	
	)	
Diana S Daugherty, Chapter 13 Trustee	)	
	)	
Movant.	)	

RESPONSE TO TRUSTEE'S OBJECTION TO CLAIM NO. 24

COMES NOW Respondent, U.S Bank National Association, as Trustee for SASCO Mortgage Loan Truste 2005-WF3, its successors and or assigns ("Respondent"), by and through its attorney, and responds to the Trustee's Objection to Claim No. 24, as follows:

1. On August 25, 2017, Stanley L. Watson, Sr. and Victoria Watson ("Debtors") filed for protection in the Bankruptcy Court of the Eastern District of Missouri, under Chapter 13 of the Bankruptcy Code, being bankruptcy case number 17-45822-399.
2. Diana S. Daugherty is the appointed Chapter 13 Trustee ("Trustee").
3. The deadline for filing claims was December 19, 2017 ("the Claims Bar Date").
4. On October 12, 2017, the Bankruptcy Court entered its Order Denying Debtor Stanley Watson's Motion to Impose the Automatic Stay. On the same date the Bankruptcy Court entered its Order Granting Debtor Victoria Watson's Motion to Extend the Automatic Stay ("the Order Extending the Automatic Stay"), extending the automatic stay as to all creditors, except Respondent.

5. On December 28, 2017, the Bankruptcy Court vacated the Order Extending the Automatic Stay. On the same date, the Bankruptcy Court entered another Order Extending the Automatic Stay to all creditors, including Respondent.

6. On the Claims Bar Date, the Automatic Stay was terminated as to Respondent.

7. On January 11, 2018, the Bankruptcy Court entered its Order Dismissing the bankruptcy case.

8. On January 29, 2018, the Court entered its Order Reinstating the bankruptcy case.

9. Respondent filed Claim Number 24 on February 2, 2018.

10. On April 9, 2018, Respondent filed Amended Claim Number 24-2, in the total amount of \$162,894.25 (“Claim 24”).

11. Pursuant to Part 2.9 of Claim 24, the amount necessary to cure any default as of the date of the petition is \$19,341.58 (“the Pre-Petition Arrears”).

12. Claim 24 is secured by a Note and Deed of Trust real estate located at 1724 Muriel Drive, Saint Louis, Missouri 63138 (“the Property”).

13. The Property is Debtors’ principal residence.

14. Debtors’ confirmed Chapter 13 Plan calls for Trustee to make post-petition monthly payments to Respondent; and, for the payment of the Pre-Petition Arrears.

15. On August 9, 2018, Trustee filed its Objection to Claim 24.

16. Debtors filed a Response to Trustee’s Objection requesting that Claim 24 be allowed as filed.

17. Claim 24 is necessary for an effective reorganization.

18. Respondent has filed a Motion to File Proof of Claim Out of Time.

WHEREFORE, Respondent respectfully requests that the Bankruptcy Court enter its Order: overruling Trustee's objection to Claim 24; and, allowing Claim 24 as filed by Respondent; and, for such and other relief as the Court deems necessary and proper under the circumstances.

SHAPIRO & KREISMAN, LLC

By: /s/ Zachary G. Edwards  
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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed electronically on August 17, 2018 with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

Attorney for Debtors:

Timothy P. Powderly  
The Powderly Law Firm, LLC  
11965 St. Charles Rock Road, Suite 202  
Saint Louis, MO 63044

Chapter 13 Trustee:

Diana S Daugherty  
P.O. Box 430908  
Saint Louis, MO 63143

Office of the US Trustee:

Thomas Eagleton US Courthouse  
111 S. 10th Street, Suite 6353  
Saint Louis, MO 63102

I hereby certify that a true and correct copy of the foregoing document was filed electronically on August 17, 2018 with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, to the parties listed below on August 17, 2018.

Debtors:

Stanley & Victoria Watson  
1724 Muriel Drive  
Saint Louis, MO 63138

/s/ Zachary G. Edwards

Zachary G. Edwards #63798

Adam S. Kerekanich #68602

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